

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KAREN L. MANCZAK, on behalf of herself,)
and all others similarly situated,)

Plaintiff,)

v.)

GLOBAL CLIENT SOLUTIONS, LLC, an)
Oklahoma limited liability company, GLOBAL)
HOLDINGS, LLC, an Oklahoma limited)
liability company; and DOES 1-10, inclusive,)

Defendants.)

Case No.: 1:11-cv-07987

Hon. Gary Feinerman

**AGREED MOTION FOR EXTENSION OF TIME
TO FILE RESPONSE TO COMPLAINT AND TO RESET STATUS HEARING**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rules 5.3 and 5.4, Defendants Global Client Solutions, LLC and Global Holdings, LLC (collectively, “Defendants”), in agreement with Plaintiff Karen Manczak, respectfully request an extension of time for Defendants to respond to Plaintiff’s Complaint until and including April 16, 2012, and to reset the Status Hearing scheduled for April 11, 2012. In support of this motion, Defendants state as follows:

1. This Court may, for good cause as shown herein, grant an extension of time for Defendants’ to respond to Plaintiff’s Complaint. *See* Fed. R. Civ. P. 6(b)(1).

2. Defendants’ Response to the Complaint is currently due on April 2, 2012. (Dkt. No. 38).

3. Although Defendants and Plaintiff were originally engaged in discussions to agree upon terms for which the parties may submit this matter to arbitration, the parties are now engaging in settlement negotiations and are very close to reaching a settlement in this matter.

The parties hope to have this process completed in the next few days. Consequently, the parties have agreed that an extension of time –through and including April 16, 2012 – is necessary so that they can attempt to work out and finalize such terms without the need of engaging in further litigation.

4. Counsel for Plaintiff and Defendants have discussed and agreed to the filing of this Motion and the requested extension of time.

5. This is Defendants' fifth (agreed) request for extension of time with respect to filing its response to Plaintiff's Complaint.

6. This Motion is filed in good faith and not for purposes of delay, as all parties agree that such an extension is necessary.

7. The parties further request that, should the Court grant this extension, the Court also reset for a later date the Status Hearing that is currently scheduled for April 11, 2012 at 9:30 a.m. (Dkt. No. 38).

8. No party will be prejudiced by the granting of this Motion.

WHEREFORE, for the reasons set forth above, and pursuant to Fed. R. Civ. P 6(b)(1), Defendants respectfully request an extension of time to and including April 16, 2012 to respond to Plaintiff's Complaint, and that the Court reset the Status Hearing scheduled for April 11, 2012.

Dated: March 30, 2012

Respectfully Submitted,
GLOBAL CLIENT SOLUTIONS, LLC, and
GLOBAL HOLDINGS, LLC

/s/ Timothy A. Hudson

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